

Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

ME2 PRODUCTIONS, INC.,

Plaintiff,

v.

FAHAD BUSBAIT, an individual;
ELZIE HENDERSON, an individual;
D'ANTHONY LE-GREENHALGH, an
individual;
CARLOS HERNANDEZ, an individual;
LILIANA RAMOS, an individual;
DARA CHAMROEUN, an individual; and
MERRIDY EASON, an individual,

Defendants.

Civil Action No. 17-cv-99RSL

MOTION FOR ORDER TO SHOW
CAUSE TO RESPOND

NOTE ON MOTION CALENDAR:
October 6, 2017

Plaintiff respectfully submits this response to the Court's August 7, 2017 Order Regarding Initial Disclosures, Joint Status Report and Early Settlement.

Liliana Ramos is the sole remaining defendant in this case not in default. As confirmed in the accompanying declaration of counsel, Plaintiff has made no fewer than seven attempts (three in writing) to obtain Ms. Ramos' participation on the Court-ordered Rule 26(f) conference and to prepare the required Joint Status Report. To date, Ms. Ramos has ignored all requests, making it

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1 impossible for Plaintiff to have the Rule 26(f) conference, submit the required Joint Status Report,
2 or even commence formal discovery to prosecute this case.

3 Plaintiff accordingly requests an order to show cause to show cause why Ms. Ramos should
4 not be ordered to participate in good faith in the required Rule 26(f) conference and Joint Status Report
5 preparation, and further should not be sanctioned for her failure to meet the obligation of Rule 26(f) to
6 date.

7 RESPECTFULLY SUBMITTED September 19, 2017.

8 s/David A. Lowe, WSBA No. 24,453

9 Lowe@LoweGrahamJones.com

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12 Attorneys for Plaintiff

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MOTION FOR ORDER TO SHOW CAUSE TO
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document has been served to all counsel or parties of record who are deemed to have consented to electronic service via the Court's CM/ECF system, and via U.S. Mail to:

Liliana Ramos
2044 S. 17th St.
Tacoma, WA 98405

s/ David A. Lowe